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January 21, 2025

BY ECF AND EMAIL

The Honorable Paul A. Engelmayer
United States District Court
Southern District of New York
40 Foley Square, Room 2201
New York, NY 10007
EngelmayerNYSDChambers@nysd.uscourts.gov

Re: United States v. Do Hyeong Kwon, 23-cr-151

Dear Judge Engelmayer,

We represent Defendant Do Kwon in the above-captioned case and write in response to the Court's January 17, 2025 Order (ECF No. 24) seeking Mr. Kwon's position on a disputed issue in the otherwise undisputed proposed Protective Order submitted by the Government (ECF No. 23). At the time the Government submitted its letter on Friday, we had not reached an agreement with the Government on Paragraph 2.d of the proposed Protective Order, and accordingly the Court asked that we submit this letter and scheduled a conference for Thursday, January 23, 2025.

Between Friday and today we have had further discussions with Mr. Kwon's foreign counsel and have agreed to the Government's proposed Paragraph 2.d, without prejudice to requesting modifications to the Protective Order from the Court in the future. Accordingly, there are no disputed provisions of the Protective Order, and we consent to the Government's request that the Court enter the Protective Order as drafted and attached to the Government's letter.

We respectfully ask that the Court adjourn this Thursday's conference, with apologies that the request is being made with less than 48-hours' notice. The Government joins this request.

Hecker Fink LLP

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "M. Ferrara", with a stylized flourish at the end.

Michael Ferrara